

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

FO2GO LLC,

Plaintiff,

v.

KEEPITSAFE INC.,

Defendant.

C.A. NO. 1:18-cv-807-RGA

JURY TRIAL DEMANDED

**STIPULATION AND PROPOSED ORDER TO DISMISS
WITH PREJUDICE PURSUANT TO RULE 41(A)(2)**

Pursuant to FED. R. CIV. P. 41(a)(2) and (c), Plaintiff FO2GO LLC and Defendant KeepItSafe Inc. hereby stipulate, subject to the approval and order of the Court, that all claims and counterclaims in this action asserted between them be dismissed WITH PREJUDICE with each Party to bear its own costs, expenses, and attorneys' fees.

September 5, 2019

STAMOULIS & WEINBLATT LLC

/s/ Stamatios Stamoulis

Stamatios Stamoulis
800 N West Street, Third Floor
Wilmington, DE 19801
(302) 999-1540
stamoulis@swdelaw.com

OF COUNSEL:

David R. Bennett
(Admitted *pro hac vice*)
Direction IP Law
P.O. Box 14184
Chicago, IL 60614-0184
(312) 291-1667
dbennett@directionip.com

Attorneys for Plaintiff FO2GO LLC

YOUNG CONAWAY STARGATT &
TAYLOR, LLP

/s/ Melanie K. Sharp

Melanie K. Sharp (No. 2501)
James L. Higgins (No. 5021)
1000 North King Street
Wilmington, DE 19801
(302) 571-6600
msharp@ycst.com
jhiggins@ycst.com

RUTTENBERG IP LAW
Guy Ruttenberg
Michael Eshaghian
1801 Century Park East, Suite 1920
Los Angeles, CA 90067
(310) 627-2270

Attorneys for Defendant KeepItSafe, Inc.

SO ORDERED, this _____ day of _____, 2019.

United States District Court Judge

CERTIFICATE OF SERVICE

I hereby certify that on September 5, 2019, I electronically filed the above documents with the Clerk of Court using CM/ECF which will send electronic notification of such filings to all registered counsel.

/s/Stamatios Stamoulis
Stamatios Stamoulis (#4606)